

EXHIBIT Q

RAELEAN McGEE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business
as BOULEVARD BLACK ANGUS, also known as
BLACK ANGUS MEATS, also known as
BLACK ANGUS MEATS & SEAFOOD,
ROBERT SEIBERT,
DIANE SEIBERT,
KEEGAN ROBERTS,

Defendants.

Examination Before Trial of
RAELEAN McGEE, taken pursuant to the Federal Rules of Civil
Procedure, in the law offices of GRECO TRAPP, PLLC, 1700
Rand Building, 14 Lafayette Square, Buffalo, New York,
taken on May 20, 2019, commencing at 9:28 A.M., before
MARY ANN MORETTA, Notary Public.

1 while working, in reference to a woman's breasts,
2 your headlights are on, would you find that to be
3 offensive?

4 A. Yes.

5 Q. If a male at Black Angus Meat referred to any
6 female, she's got a nice ass, would that be
7 offensive?

8 A. Yes.

9 Q. Would it ever be appropriate in the workplace?

10 A. No.

11 Q. Did you ever hear that -- from Darcy or anyone,
12 that her children were referred to in an
13 offensive term by anybody at Black Angus Meat?

14 A. No.

15 Q. Do you recall Darcy Black calling you the day she
16 was fired, the day she left work?

17 A. I don't remember, no.

18 Q. Do you recall her contacting you on her way --
19 actually, on her way as she left the building,
20 and telling you that Jamie Lapress had referred
21 to her children as niggers?

22 A. No, I don't remember that.

23 Q. Would it ever be appropriate -- well, first, have

1 A. If she knew, yes.

2 Q. But you have no recollection of Darcy calling
3 you?

4 A. No.

5 Q. No recollection of her telling you how Jamie
6 Lapress referred to her children?

7 A. No.

8 Q. Do you ever recall her telling you that Bob
9 Seibert told her -- do you ever recall her
10 telling you -- strike that.

11 Do you ever recall her describing an
12 incident to you where, on or about May 15, 2010,
13 Mr. Lapress needed a key for the paper towel
14 holder by the sink in the deli? He asked Miss
15 Black if she could break into it. When she said
16 no, Mr. Lapress said you have two black kids, so
17 you must know how. Miss Black told him that her
18 children do not steal, they don't break into
19 stuff. And she asked him why he would say that.
20 He replied because they are niggers.

21 Did you ever learn that?

22 A. No.

23 Q. If you heard him say that to Darcy, would you be